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December 16, 2005

**BY HAND**

Honorable Jaclyn A. Brilling  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

**Re: Case 97-C-0139 – Compliance Filing – Order Establishing  
Modifications to the Inter-Carrier Service Quality Guidelines**

Dear Secretary Brilling:

Enclosed please find an original and twenty (20) copies of the Compliance Filing of Verizon New York Inc. for the Carrier-to-Carrier Guidelines (the “Guidelines”), which are being filed pursuant to the “Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines,” issued December 1, 2005 (the “December Order”). The Compliance Filing consists of the following documents: (1) a red-lined version of the East Carrier-to-Carrier Guidelines and Appendices to reflect changes made pursuant to the December Order (Attachment 1), and (2) a clean copy of the entire, updated Carrier-to-Carrier Guidelines and Appendices (Attachment 2).

Since the Guidelines are now a regional document, please note that we have made a few changes to the Guidelines that are not specific to New York. The disposition of these changes will be discussed in each state’s respective compliance filing:

1. The Table of Contents has been updated to reflect the fact that New Jersey has its own version of Exhibit 1 and that Appendix K is applicable to Delaware.
2. Footnotes 11 and 14 under metrics OR-1 and OR-2 pertaining to SOACS/expressTRAK downtime in the District of Columbia and West Virginia have been removed. These footnotes set out the SOP scheduled downtime hours that will apply “until SOACS is no longer in use.” SOACS is no longer in use. Accordingly, these footnotes are no longer needed.
3. Metrics BI-3-01, BI-3-02, and BI-3-03, which are only applicable in Pennsylvania, have been removed consistent with a Pennsylvania PUC order.<sup>1</sup>

In addition, please be advised that the consensus metrics changes approved by the Commission have been scheduled for inclusion in the April, 2006 IT Release.

Finally, in the December Order, the Commission directed Verizon to “address its ability to implement modifications that remove UNE platform, line sharing, and line splitting products to coincide with the discontinuance of UNE platform services in March 2006 or demonstrate the necessity of an alternative timeframe.” (December Order at 21.)

These modifications should be implemented coincident with the implementation of any corresponding modifications to the Performance Assurance Plan (“PAP”), which is currently being addressed in Case 99-C-0949. Coordinating implementation of these C2C modifications with the Commission’s adoption of revisions to the PAP is vital to ensure that the PAP continues to function effectively. The current PAP includes a number of provisions that are interrelated, such as the Domain Clustering Rule and the Bill Credit reallocations methodology in the Mode of Entry, that require activity in most of the metrics in each Mode for the PAP to function properly. If the C2C changes are implemented before the revisions to the PAP, most of the

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<sup>1</sup> *Performance Metrics and Remedies*, PA PUC Case M-00011468008 (September 9, 2005).

metrics in the UNE Platform Mode and a significant portion of the metrics in the DSL Mode will have no activity. In addition, metrics in the UNE Platform Mode that do have activity will be reporting activity that is unrelated to UNE platform. Lack of activity will cause similar dysfunction in the reallocation of bill credits in the UNE platform and DSL sections of the Critical Measures. In short, if the current PAP is not modified to reflect the elimination of the UNE platform, line splitting and line sharing products, it will not function properly.

Accordingly, Verizon will implement the removal of the UNE platform, line sharing, and line splitting products when it implements the next round of changes to the Performance Assurance Plan. Verizon estimates that that should occur sometime in the middle of 2006.

Respectfully submitted,

William D. Smith

cc: Active Parties (By E-Mail)